10/14/15 01:59AM

Quijano and Ennis

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October 13, 2015

## BY Facsimile (212) 805-4060

Honorable Kevin N. Fox United States Magistrate Judge United States District Court for the Southern District of New York 500 Pearl Street New York, New York 10007

DOC #\_

Re: U.S.A. v. DANIEL DAWSON, 15 MAG. 675

Dear Magistrate Judge Fox:

I am the attorney for the defendant Daniel Dawson in the above referenced matter, having been appointed by the Honorable James C. Francis, U.S.M.J., on March 10, 2015, pursuant to the provisions of the Criminal Justice Act, 18 U.S.C. § 3006A. Mr. Dawson is charged in a complaint with conspiracy to distribute and possess with the intent to distribute oxycodone, in violation of 21 U.S.C. §§ 841 (b)(1)(C), 846; and transferring false identification with the intent of committing another crime, in violation of 18 U.S.C. §1028(a)(7) and 2. On April 15, 2015, the Honorable Sarah Netburn, U.S.M.J., released Mr. Daniels, pursuant to an agreed upon Bail Package, which included, inter alia, home incarceration with electronic monitoring.

Mr. Dawson's girlfriend Kristen Trampler is pregnant with their child. Mr. Dawson respectfully requests permission to attend a Baby Shower on October 19. 2015, at 1401 157th Street, Queens, New York, from 2:00 P.M to 4:30 P.M. He estimates approximately an hour of travel time.

Accordingly, it is respectfully requested that the Court SO ORDER a temporary modification his Bond to permit that Mr. Dawson permission to leave his home on October 19, 2015 from 1:00 P.M until 5:30 P.M. I have conferred with A.U.S.A. Robert Allen and U.S. Pretrial Services Officer Joshua Rothman.

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Honorable Kevin N. Fox, U.S.M.J. October 13, 2015 Page two

and I understand that the government and the U.S. Pretrial Services have no objection to the temporary modification of the conditions of release for Daniel Dawson.

Your Honor's attention to and consideration of this request are, as always, greatly appreciated.

Respectfully submitted,

Peter Enrique Quijano

cc: A.U.S.A. Robert Allen (by email)

U.S. Pretrial Services Officer Joshua Rothman (by email)

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## TELECOPY MEMORANDUM

U.S. v. DANIEL DAWSON, 15 MAG. 675 RE:

DATE: October 13, 2015

HONORABLE KEVIN N. FOX, U.S.M.J. TO:

TELECOPIER NUMBER: (212) 805-4060

FROM: Peter Enrique Quijano, Esquire

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